



From the desk of Gerasimos D. Liberatos, Esq.
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May 2, 2023

VIA ECF

Magistrate Judge Lois Bloom
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: Meerovich v. Big Apple Institute, Inc. et al
Case No. 1:22-cv-07625

Dear Magistrate Judge Lois Bloom:

We represent defendants Big Apple Institute, Inc. and Bronislav Leydiker (collectively “Defendants”) in the above-referenced action. This letter is in response to the Order dated May 2, 2023, regarding the failure to respond to the Complaint.

We sincerely apologize to the Court for not notifying and filing a proposed stipulation for the Court’s consideration in connection with the parties agreement to extend time for defendants to respond to the Complaint until May 12, 2023 (“Stipulation”). Enclosed with this letter for the Court’s consideration is the fully executed copy of the Stipulation.

The additional time was requested as the attorney handling the matter Yi-Hsin Wu, Esq. is no longer with our firm, which required depositions and motions that Ms. Wu was also handling to be rescheduled for the week of April 24, 2023 and May 1, 2023. As such, due to Ms. Wu’s departure it was an oversight by the undersigned to follow up with Plaintiff’s counsel to request a signed stipulation to file for Your Honor’s consideration.

We thank the Court for extending the Defendants’ time to respond to the Complaint until May 8, 2023, and respectfully request additional time until May 12, 2023, as stipulated by the parties due to the undersigned scheduling conflicts with other matters.

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This is Defendants' second request for an extension to respond to the Complaint, which the previous request was granted on March 28, 2023. Counsel for the Plaintiff has consented to the within request.

Thank you for your time and consideration, and again we apologize to the Court for any inconvenience we may have caused.

Very truly yours,

A handwritten signature in black ink, appearing to read "G. Liberatos", written over a horizontal line.

Gerasimos D. Liberatos, Esq.

CC: Counsel of Record (via ECF)

Encl.

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

-----X
MIKHAIL MEEROVICH,

Plaintiff,

– against –

BIG APPLE INSTITUTE, INC., and BRONISLAV
LEYDIKER,

Defendants.
-----X

Case No.: 1:22-cv-7625

**STIPULATION
EXTENDING
DEFENDANTS' TIME TO
RESPOND TO COMPLAINT**

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned attorneys herein, that the time for Defendants, BIG APPLE INSTITUTE, INC., and BRONISLAV LEYDIKER, to respond, move, or otherwise answer Plaintiff's Complaint is hereby extended up through and including May 12, 2023.

IT IS HEREBY FURTHER STIPULATED AND AGREED that fax or electronic signatures shall be deemed originals for the purposes of this Stipulation and that a fax or electronic copy of this Stipulation may be filed with the clerk and used for all purposes.

Dated: May 2, 2023
New York, New York

AKILOV LAW, P.C.
Attorneys for Plaintiff Mikhail Meerovich

SITARAS & ASSOCIATES, PLLC
Attorneys for Defendants Big Apple Institute,
Inc., and Bronislav Leydiker

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